

From: [John Hebert](#)
To: [Dan Peacock](#)
Subject: Fw: RED requirements for field baits
Date: 03/23/2012 04:25 PM

dan - can you please look into this? do you know why reregistration wasn't done on this SLN? thanks.

----- Forwarded by John Hebert/DC/USEPA/US on 03/23/2012 04:23 PM -----

From: Thomas Schmit <SchmitT@liphatech.com>
To: John Hebert/DC/USEPA/US@EPA
Date: 03/22/2012 03:23 PM
Subject: RED requirements for field baits

Hello John -

Back in 2009, I inquired about the status of the following product:
EPA SLN No. CA 780146, "P.C.Q. Pelleted Rodent Bait" registered by Bell Laboratories

This product is still being sold, with the label as attached to this e-mail (taken from Bell's web site this morning). This is a field rodenticide that does not meet the Rodenticide Cluster RED requirements in that:
-it has AI level higher than 0.005%
-it is not classified as RUP as is required of "field" rodenticides applied above-ground.

This product has not been brought up to current requirements since I first inquired almost 3 years ago. It continues to have an unfair advantage over competing products that have been amended to comply with the RED requirements.

Before Liphatech submits a formal complaint to the Administrator, I thought it appropriate to hear from you first!

Thanks - Tom

-----Original Message-----

From: Hebert.John@epamail.epa.gov [mailto:Hebert.John@epamail.epa.gov]
Sent: Wednesday, May 27, 2009 10:21 AM
To: Thomas Schmit
Cc: Rachel Callies; Al Smith; Carl Tanner
Subject: RE: RED requirements for chlorophacinone

Tom - that SLN is still undergoing (pending) product reregistration.

John

From: "Thomas Schmit" <SchmitT@liphatech.com>
To: John Hebert/DC/USEPA/US@EPA
Cc: "Rachel Callies" <CalliesR@liphatech.com>, "Al Smith" <SmithA@liphatech.com>, "Carl Tanner" <TannerC@liphatech.com>
Date: 05/27/2009 09:40 AM
Subject: RE: RED requirements for chlorophacinone

Thank you John.
Yes, I request additional follow-up on the product identified as:
EPA SLN No. CA 780146, "P.C.Q. Pelleted Rodent Bait" registered by Bell Laboratories.

Thanks - Tom

-----Original Message-----

From: Hebert.John@epamail.epa.gov [mailto:Hebert.John@epamail.epa.gov]
Sent: Tuesday, May 26, 2009 3:45 PM
To: Thomas Schmit
Cc: Rachel Callies; Al Smith; Carl Tanner
Subject: RE: RED requirements for chlorophacinone

Hi Tom - Sorry that it's taken so long to get back to you. I still haven't gotten back a clear answer from SRRD or DanP. But I checked on the status of these products in the reregistration queue (I should have just done this by myself to begin with) and we have reregistered two of the SLNs you listed. I've attached the letters/labels for those reregistration actions. Let me know if you need anything else.

Regards,
John

(See attached file: [Untitled].pdf)
(See attached file: [Untitled].pdf)

From: "Thomas Schmit" <SchmitT@liphatech.com>
To: John Hebert/DC/USEPA/US@EPA
Cc: "Al Smith" <SmithA@liphatech.com>, "Rachel Callies" <CalliesR@liphatech.com>, "Carl Tanner" <TannerC@liphatech.com>
Date: 05/18/2009 12:18 PM
Subject: RE: RED requirements for chlorophacinone

Hello John -
Any info on this RED requirement?
Thanks - Tom

From: Thomas Schmit
Sent: Friday, May 08, 2009 11:14 AM
To: Hebert.John@epamail.epa.gov
Subject: RED requirements for chlorophacinone

Hello John -

Thank you for taking my call this morning.

The Rodenticide Cluster RED document clearly states (in Section B(5), page 112 of the printed RED document) that chlorophacinone and diphacinone products for above-ground application to control field rodents will be limited to 0.005% active ingredients, and that higher AI levels will not be allowed.

There are currently several SLN products for above-ground use on field rodents that contain 0.01% AI, including:

EPA SLN No. CA 780146, "P.C.Q. Pelleted Rodent Bait" by Bell Laboratories EPA SLN No. CA 890022, "Rodent Bait Diphacinone Treated Grain (0.01%)" by CA Dept of Food & Ag
EPA SLN No. CA 890024, "Rodent Bait Chlorophacinone Treated Grain (0.01%)" by CA Dept of Food & Ag EPA SLN No. CA 930022, "Chlorophacinone Treated Artichoke Bracts (0.01%)" by CA Dept of Food & Ag

Our question is very simple:
Have (or Will) these four products be re-registered with 0.01% AI for above-ground field rodent control?

Please indicate if any of these products have actually been re-registered in 2008 or 2009.
Because SLN labels are not included in EPA's on-line library of stamped-approved labels, we cannot determine if or when label changes are made.

Thanks for your assistance!

Tom Schmit
Liphatech, Inc.

[attachment "PCQ.pdf" deleted by John Hebert/DC/USEPA/US]